

Exhibit J

From: Paul Farrell Jr. <Paul@FarrellFuller.com>
Sent: Friday, February 23, 2024 10:02 AM
To: Springer, Brandon
Cc: Boone, Brian; McGowan, Emily; Harder, Bradley; Chemerinsky, Kim; Jordan, Bill; PBM@listserv.motleyrice.com; Optum Opioid Team; Jayne Conroy; Joe Rice; Peter H. Weinberger
Subject: Re: MDL2804: PBM: Optum deficiency notice for discovery responses

EXTERNAL SENDER – Proceed with caution

Mr. Springer,

As we informed your colleague, the PEC declines to meet with Optum in an unsupervised, off-the-record teleconference related to Optum's discovery responses. Optum has accused the PEC, and me personally, of taking a "frivolous" position regarding a discovery dispute in violation of Rule 11. Your firm has misrepresented and manipulated my spoken words during a teleconference with the Special Master. We will confer in writing with your law firm until further notice.

Optum needs to respond to our deficiency letter in writing.

The PEC Co-Leads are cc: on this email.

Paul T. Farrell, Jr., Esq.

Farrell & Fuller, LLC
270 Munoz Rivera Ave., Suite 201
San Juan, Puerto Rico 00918
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"Facts are stubborn things."

-John Adams
President of the United States.
Trial lawyer.

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On Feb 23, 2024, at 10:08 AM, Springer, Brandon <Brandon.Springer@alston.com> wrote:



External
(brandon.springer@alston.com)



GUA

Paul,

Please let us know if you are available next Wednesday or Thursday for a meet and confer to discuss your February 13 letter regarding OptumRx's objections and responses to Plaintiffs' December 29, 2023 discovery requests.

During the February 14 "supervised meet and confer" with Special Master Cohen, we all agreed that discussions would be more fruitful after receiving the Court's order on Plaintiffs' motion for leave to amend the bellwether complaints. We now have that order.

Thanks,

Brandon Springer
ALSTON & BIRD LLP
(704) 444-1007

From: Paul Farrell Jr. <Paul@FarrellFuller.com>
Sent: Tuesday, February 13, 2024 3:37 PM
To: Boone, Brian <Brian.Boone@alston.com>
Cc: McGowan, Emily <Emily.McGowan@alston.com>; Harder, Bradley <Bradley.Harder@alston.com>;
Springer, Brandon <Brandon.Springer@alston.com>; Chernerinsky, Kim
<Kim.Chernerinsky@alston.com>; Jordan, Bill <Bill.Jordan@alston.com>; PBM@listserv.motleyrice.com
Subject: MDL2804: PBM: Optum deficiency notice for discovery responses

EXTERNAL SENDER – Proceed with caution

Dear Optum,

Please see attached deficiency letter related to discovery.

Paul T. Farrell, Jr.
FARRELL & FULLER, LC
270 Muñoz Rivera Ave., Suite 201

San Juan, PR 00918
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Trial lawyer.

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